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**UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF WISCONSIN
CIVIL DIVISION**

23-C-215

Donald McEuens, ABA ID # is 05787346

Plaintiff

-V-

Andy Leis, Robert Diggins, Anthony Adams, Laura Hass,
Andre Griffin and Heidi Beaudoin,

Defendants.

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Now comes before this Honorable Court the plaintiff in full compliance with Rule 15 of the Federal Rules of Civil Procedure, which allows the plaintiff to amend his/her complaint.

Defendant Andy Leis per conversation with the plaintiff on January 14th defendant Andy Leis had informed the plaintiff that if he wanted to move. Plaintiff could move into 857 North 29th Street Apartment #8 and it would cost him a \$1,000 security deposit and \$700 monthly for rent.

Plaintiff would like to assert that Apartment #8 at 857 North 29th Street had just had a major fire and the former occupant caused the fire from smoking in bed, which had oxygen tanks in his apartment and a sign posted on his door stating, "No smoking oxygen in use."

Defendants, especially Andy Leis, knew that the former occupant smoked despite the sign on his door. Plaintiff spent every week in Apartment #16 at 857 North 29th Street.

Defendant Andy Leis was informed via text and in front of a witness that he was moving out and that Defendant was attempting to take advantage plaintiff's kindness to charge \$1700 for an Apartment that was infested with mice and numerous building code violations in which the average one-bedroom apartment goes for \$465.

Defendant has a notorious history of praying for the mentally disabled and those suffering from addiction.

Case in point at one of the defendant's other buildings on Highland he had three tenants Carrie Monocamp, James Westphal, and their autistic

Defendant Laura Hass is also staff at project heat and peer support at UCC and has broken client confidentiality it's speculative that she knew of a former client's drug use before her finding him overdosed in his room due to her lewd affixation with this particular client, and also conspired and had communications with a fugitive from justice Adam Lovejoy.

Defendant Andre Griffin was a former client at Project Heat, who is an ex-felon that was brandishing firearms, and staff and clients all knew at project heat, the defendant was awarded \$190,000 from a personal injury settlement and was paying his former roommate to cover up his drug dealing and other unscrupulous acts in breaking the law. In front of the plaintiff in the laundry room at project heat, defendant Andre Griffin offered defendant Robert Diggins \$5,000 cash to buy him a new car. It should be fully noted that defendant Andre Griffin inferred that he was going to buy into project heat.

Defendant Heidi Beaudoin was informed by the plaintiff upon his return from following his doctor's orders that the plaintiff had contacted Alderman Bob Baum who lives adjacent to the defendant's building at 857 North 29th Street he and his wife and a week later camera the Alderman's home was shot up. Alderman Bob Baum was trying to shut down project heat and our safe place owned by defendant Andy Leis. Heidi Beaudoin is the house snitch at project heat and before the Alderman's home was shot up got in defendant Andre Griffin's vehicle she stated that staff said if defendant Andre Griffin was caught selling drugs he would be prosecuted to the fullest extent of the law.

daughter Sky. Defendant Andy Leis kept raising the rent until tenants were unable to pay and he evicted all three former occupants in the Winter.

Defendant stated via text, and witness that the plaintiff owed two months for September and October of 2022 but when the plaintiff said that he had all his rent receipts defendant stated the plaintiff did not owe anything and someone was messing with the books. Plaintiff inquired about his pro rate owed because he had paid up until December 2022 and January 2023.

Defendant stated via text and still in front of a witness "I haven't been in cuz my son has strep throat, we will work things out we are both honorable men the defendant later said that the plaintiff was extorting him, and he was not giving him his pro rate and the plaintiff would have to take him to court.

Defendant Robert Diggins was made aware of the black mold throughout the building at 2904 West Wells Street, particularly in apartment #205 in which an array of photos was taken for six weeks, and the plaintiff was ordered by his primary doctor to move immediately due to the black mold and with an underlined condition of COPD put the plaintiff at risk. The county came out and the city inspector at least three times.

Defendant Robert Diggins collectively with the defendant Andy Leis painted over the black mold throughout the building and denied floods in the building. Mold is caused by moisture.

Defendant Anthony Adams has made racial slurs to the plaintiff racially profiling him and other ethnic groups conspired to communicate with a fugitive from justice Adam Lovejoy and made lewd sexual comments to female clients at project heat.

Respectfully Submitted by:

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C/O United States

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